UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 18, 2008

Mr. Jeffrey D. Williams
Utilities Upgrades EIS
c/o e2m, Suite 200
2751 Prosperity Avenue
Fairfax, VA 22031

Re: Fort George G. Meade Utilities Upgrade Project, Proposes to Construct and Operate (1) North Utility Plant (2) South Generator Facility and (3) Central Boiler Plant, Fort George M. Meade, MD (CEQ 20080421)

Dear Mr. Williams:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement for the Fort George G. Meade Utilities Upgrade Project. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of the EPA's rating system is enclosed for your information.

The purpose of the proposed action is to upgrade and modernize aging utilities infrastructure through renovation, modernization, and replacement on the National Security Agency (NSA) campus at Fort George G. Meade to support the capabilities of the existing NSA campus for current and future missions. The proposed action would include the construction and operation of a North Utility Plant, a South Generator Facility, a Central Boiler Plant, and associated infrastructure.

The North Utility Plant is proposed to provide electrical power with redundancy, and would consist of a North Electrical Substation, a North Generator Facility, transmission lines, and distribution lines. The North Electrical Substation would provide 50 megavolt-amperes (MVA) of power to the NSA campus. The North Generator Facility would provide 60 to 65 megawatts (MW) of emergency electrical power generated by diesel engine/generator sets. The proposed generator sets would have a selective catalytic reduction (SCR) system to control air pollutant emissions, and each generator would be equipped with an exhaust stack no taller than 35 feet above ground level. The North Generator Facility would also include aboveground storage tanks (ASTs) for diesel fuel, waste oil, and urea. The total building footprint for the North Utility Plant would be approximately 105,000 square feet (2.4 acres). Installation of electrical distribution lines would disturb up to 90,000 square feet of area. Installation of transmissions lines, which could be either overhead or underground, could disturb up to 53,000 square feet of area. It is assumed that all internal campus utility lines would be installed in

previously disturbed areas. The Department of Defense (DOD) has identified an undeveloped wooded area (Site 4) as the preferred location of this facility. Three other location alternatives are also considered (Sites 1, 2, and 3).

The proposed South Generator Facility is intended to provide emergency electrical power to supplement an existing South Utility Plant. As part of this project, an emergency generator facility currently capable of generating 17.6 MW of electrical power would be replaced with a larger generator facility that is capable of generating 47 to 52 MW of emergency electrical power using diesel engine/generator sets. The proposed generator sets would have an SCR system to control air pollutant emissions, and each generator would be equipped with an exhaust stack no taller than 35 feet above ground level. The South Generator Facility would also include ASTs for diesel fuel, waste oil, and urea. The total building footprint would be 60,000 square feet (1.4 acres). For the proposed South Generator Facility, DOD identified the existing site (Site 5) as the preferred site. Two other location alternatives were identified (Sites 6 and 7).

The Central Boiler Plant would replace an existing outdated boiler plant. Four vintage boilers would be replaced with four comparably sized modern dual-fuel boilers with a total heat input rating of 392 million British thermal units per hour (MMBtu/hr). Similar to the existing boiler plant, the proposed Central Boiler Plant would operate primarily using natural gas with No. 2 fuel oil backup. Two modern ASTs for No. 2 fuel oil, with associated spill containment storage, are proposed to replace the existing ASTs. The footprint for the Central Boiler Plant would be approximately 18,000 square feet (0.4 acres). For the new Central Boiler Plant, DOD has identified the existing site of the boiler plant and ASTs as the preferred alternative (Site 8) and one alternative location (Site 7).

Because the NSA campus has limited land that can be developed, construction of new facilities could result in the displacement of some campus parking, depending on the facility alternative selected. Preliminary screening resulted in two primary parking alternatives: construction of one or more surface lots or construction of a parking garage. The alternatives evaluated as representative of the range of alternatives include the construction of surface parking lots at undeveloped sites (Sites 4 and 6), construction of a parking garage at Site 3, construction of a parking garage at Site 9, and construction of a parking garage at Site 10.

In general, EPA supports the purpose and need for the proposed action in the Draft EIS. EPA understands the need to upgrade utilities necessary to support the existing campus and the mission going forward. However, based on our review of the DEIS, EPA has environmental concerns with the impact to the loss of forested areas on the Forest Conservation Area if Site 4 and Site 6 were selected to meet facility/parking needs. EPA offers the following specific comments for your consideration in development of the Final EIS for this project.

Alternatives

North Utility Plant: DOD's preferred alternative for the North Utility Plant is Site 4. Site 4 is an undeveloped parcel of land, approximately 6.1 acres, within a Forest Conservation Area. Development of the of the North Utility Plant would result in the removal of approximately 4 acres of trees and require a new access road which would most likely cross a perennial stream. DOD is aware that Site 4 would have a greater potential for environmental impacts if the North Utility Plant were constructed there; however, there would be no loss of parking.

Some discrepancies may need to be clarified. In particular, the actual space needed for the North Utility Plant is determined to be approximately 2.4 acres. However, development for the plant at Site 4 would result in the removal of 4 acres of trees. It is not clear why more trees are designated for removal than what is needed for the plant. Is it the need for the access road that would require additional tree removal? To have a better understanding, this should be addressed in the FEIS.

As noted on page 2-15, Site 4 is "outside of the NSA-controlled perimeter." Thus, Site 4, the preferred alternative, does not meet the first of DOD's evaluation criteria for the facility alternatives as listed on page 2-11. The first criteria listed states that the site be "within the NSA campus." The boundary for the NSA campus should be depicted on a map.

Also, when comparing alternatives, the other sites appear to be less environmentally intrusive and can possibly provide opportunities to meet both facility and parking needs. For instance, the current use of Site 1 is a parking lot which consists of approximately 7.3 acres. If the North Utility Plant requires approximately 2.4 acres, then a portion of the parking lot can be preserved or redesigned. It is stated on page 2-12 that, "If Site 1 were selected as the location for the North Utility Plant, it is likely that the site design and engineering would be able to minimize the amount of actual parking area lost so that some parking could still be used." "However, for the purposes of this EIS, it is assumed that construction of the North Utility Plant would result in the loss of 7.3 acres of parking." The latter statement contradicts the previous statement as only some parking would be lost. Also, it seems that there is a possibility that through efficient design, the total parking spaces currently available may not be completely lost or if there is a loss it may not be too significant.

The other alternative site for the North Utility Plant is Site 3. Site 3 is approximately 5.6 acres and is currently used as an overflow parking lot. It is not certain whether this site is inside or outside of the NSA-controlled perimeter; it is alongside of Site 4 (southwest). Thus, it is unclear whether this site meets DOD's evaluation criteria for the facility. Again, it is inaccurate to state that if this site is selected it would then mean a loss of 4.1 acres of parking. The North Utility Plant requires approximately 2.4 acres which would enable the retention of some parking.

Parking Alternative: It is EPA's understanding, that if Site 4 is used for the North Utility Plant, then there would be no parking loss. It is the assumption of DOD that, if an

alternate site is selected, then there would be a loss of parking. However, without a design plan the number of parking spaces lost cannot be determined and the opportunity for a more efficient design that would alleviate the potential loss cannot be assessed.

DOD designates Sites 4 and 6 as potential surface parking lot alternatives. These areas are undeveloped forested areas. The loss of 8.7 acres would remove potential wildlife habitat and could degrade some remaining and scenic and natural qualities of the NSA campus. Increased impervious surface could impact storm water velocity as well as water quality and groundwater recharge. The impact to this resource appears to be far greater than the other proposed sites (Sites 3, 9 and 10).

Wetlands

As stated on page 3-19, "An unnamed perennial stream of natural origin flows along the southeastern boundary of Site 4 and the forest stand; this stream also traverses past the southern boundary of Site 3 and continues on to the southwest." Page 4-33 states, "A stream-crossing for the site access and transmissions lines would likely be required to access the North Utility Plant at Site 4." DOD states, "If Site 4 is chosen as the location, jurisdictional wetland delineation would be required to determine if there are wetlands associated with the stream that flows along the southeastern boundary of the forest stand." To more accurately determine the degree of environmental impact, wetlands should be identified and delineated to determine impacts from the proposed action prior to the selection of a site. Wetlands present on, or immediately surrounding the site should be delineated according to the 1989 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The total size of the wetlands should be provided, in addition to the size of the wetland in the study area and size of the direct impact. The size and functional value of all impacted wetlands should be analyzed and a mitigation plan should be developed and included in the FEIS.

Vegetation

Development of the Proposed Action occurring in the forested areas (Site 4 and 6) would result in the loss of several acres of pine and deciduous hardwood forest. The DEIS states on page 4-40 that, "Under the Forest Conservation Act, 20 percent of the forest should be preserved as a Forest Conservation Mitigation Area to mitigate project impacts." With a loss of 80 percent of the Forest Conservation Area, retaining 20 percent doesn't seem to adequately mitigate for the significant loss. DOD states that, "A Forest Conservation Plan would be developed and implemented if currently forested sites were developed under the Proposed Action." A Forest Conservation Plan that would provide alternative ways to mitigate for forest loss and promote the growth of vegetation would be recommended for the protection of this valued resource.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,

/S/

William Arguto
NEPA Team Leader
Office of Environmental programs

Enclosure (1)